

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 19-cr-10345-DPW
)	
ANNE M. LYNCH,)	
Defendants)	

DEFENDANT’S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL

Defendant Anne M. Lynch, by and through undersigned counsel, hereby moves this Honorable Court to grant her permission to travel to the State of Florida from March 2, 2022 through March 16, 2022 to care for a relative. In support of this Motion, defendant states, by and through undersigned counsel, the following:

1. Defendant was arrested and appeared for her initial appearance on August 21, 2019.
2. On August 21, 2019, defendant was released on an unsecured bond of \$25,000.00 with multiple conditions of pre-trial release, including restricting travel to the six New England States (VT, ME, NH, MA, RI, CT) and New York unless otherwise permitted by the Court. To date, defendant has fully complied with all of her conditions of release.
3. On September 12, 2019, an Indictment was filed against her charging her with, *inter alia*, a racketeering conspiracy in violation of 18 U.S.C. § 1962(d), racketeering in violation of 18 U.S.C. § 1962(c), conspiracy to commit honest services wire fraud in violation of 18 U.S.C. § 1349, and honest services wire fraud in violation of 18 U.S.C. § 1343 and 1346. On September 23, 2019, defendant was arraigned and

released on the same conditions of pre-trial release. To date, defendant has fully complied with all of her conditions of release.

4. Defendant now moves for permission to travel to the State of Florida to care for a relative who will be discharged from a Florida hospital between March 2, 2022 and March 4, 2022 after having surgery to remove a bowel abscess. Specifically, defendant's relative is 72 years old and her husband, who is 83 years old, is deaf and cannot adequately care for defendant's relative once she is discharged from the hospital. Moreover, defendant's relative does not have any children who can care for her upon her discharge. If the Court grants defendant's request, defendant plans to fly from Boston to Orlando, Florida on March 2, 2022 and fly home from Orlando, Florida no later than March 16, 2022.
5. Defendant will provide US Probation Officer Kylie Fucci with an itinerary detailing where she will be staying and with whom she will be staying each night including the names, addresses and phone numbers where she can be reached at all times.
6. Finally, undersigned counsel has conferred with the government and with US Probation and neither objects to this travel request.

WHEREFORE, defendant respectfully requests this Honorable Court to grant this motion and permit her to travel to the State of Florida between March 2, 2022 and March 16, 2022.

Respectfully submitted,
For the Defendant,
Anne M. Lynch
By his attorneys:

/s/ Scott P. Lopez

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Dated: February 28, 2022

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

The undersigned counsel for Anne M. Lynch hereby certifies that he conferred with AUSA Kristina Barclay by electronic mail today in a good faith attempt to resolve or narrow the issues raised in this motion and the government has no objection to the Court granting this motion.

/s/ Scott P. Lopez

Scott P. Lopez

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on February 28, 2022.

/s/ Scott P. Lopez

Scott P. Lopez